

# **EXHIBIT 8**

IN THE CIRCUIT COURT FOR BALTIMORE COUNTY, MARYLAND

JOHN JONES, *et al.*

*Plaintiffs,*

v.

UNIVERSITY OF MARYLAND,  
BALTIMORE COUNTY, *et al.*,

*Defendants*

Case No. C-03-CV-23-004114

**MOTION TO PROCEED UNDER PSEUDONYM AND REQUEST FOR HEARING**

1. The plaintiffs,<sup>1</sup> by their undersigned counsel, respectfully request that the Court allow them to proceed by pseudonym and to redact their names from any documents filed publicly in this case.

2. The plaintiffs seek to protect their privacy as victims of sexual assault and prevent the dissemination of their identities in conjunction with this case. In cases involving confidential, embarrassing, and damaging allegations, the Court of Appeals and the Court of Special Appeals have allowed litigants to proceed under pseudonym names to protect their privacy. *E.g. Doe v. Roe*, 419 Md. 687, n. 2, 20 A.3d 787 (2011); *Roe v. Doe*, 193 Md. App. 558, n. 1, 998 A.2d 383 (2010); *Doe v. Shady Grove Adventist Hosp.*, 89 Md. App. 351, 598 A.2d 507 (1991). *See also Montgomery County Dep't of Soc. Servs. v. L.D.*, 349 Md. 239, 707 A.2d 1331 (1998); *David N. v. St. Mary's County Dep't of Soc. Servs.*, 198 Md. App. 173, 16 A.3d 991 (2011). Where plaintiffs allege they have experienced sexual assault, courts routinely recognize the need for pseudonymous pleadings. *See also, e.g., Doe v. Maryland*, No. CV ELH-20-1227, 2021 WL 1174707, at \*1 n.1 (D. Md. Mar. 29, 2021); *Doe v. Chesapeake Med. Sols., LLC*, No. CV SAG-

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<sup>1</sup> The plaintiffs can provide their names to the Court under seal, if the Court so requests.

19-2670, 2020 WL 13612472, at \*1 (D. Md. Feb. 26, 2020); *E.E.O.C. v. Spoa*, LLC, No. CIV. CCB-13-1615, 2013 WL 5634337, at \*3 (D. Md. Oct. 15, 2013).

3. In *King v. State Farm Mut. Auto. Ins. Co.*, 157 Md. App. 287, 850 A.2d 428 (2004), the Court of Special Appeals considered whether the trial court erred in allowing an insurance company to proceed anonymously as a defendant in an uninsured/underinsured motorist case. The Court favorably quoted from *Doe v. Rostker*, 89 F.R.D. 158 (N.D. Cal. 1981), where the Northern District of California noted the “common thread” in cases granting motions to proceed anonymously or under a pseudonyms: “The common thread running through these cases is the presence of some social stigma or the threat of physical harm to the plaintiffs attaching to disclosure of their identities to the public record.” *King*, 157 Md. App., at 296, 850 A.2d 428 (quoting *Rostker*, 89 F.R.D. at 161). The nature of the allegations in this case is clearly far more sensitive than those in in an uninsured/underinsured motorist case. Indeed, as noted above, courts routinely allow parties to proceed anonymously in cases involving sexual assault.

4. Here, the plaintiffs request that the pseudonyms John Jones and Dan Doe be used to refer to the plaintiffs in this case, and that any party filing original documents that contain the plaintiffs’ names be required to redact those names prior to filing.

WHEREFORE, the plaintiffs request that they be permitted to proceed by pseudonym in the instant action and redact their names from any documents filed with the Court.

Respectfully submitted,

/s/ Levi S. Zaslow

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### **REQUEST FOR HEARING**

Plaintiffs respectfully request a hearing in this matter.

/s/ Levi S. Zaslow

Levi S. Zaslow (AIS# 0812180330)

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was served via e-mail to Ann M. Sheridan, Esq., Deputy Chief, Higher Education, Office of the Attorney General, Higher Education Division, 200 Saint Paul Place, Baltimore, Maryland 21202, [asheridan@oag.state.md.us](mailto:asheridan@oag.state.md.us), and that a copy will be served along with the Complaint and accompanying documents.

/s/ Levi S. Zaslow

Levi S. Zaslow (AIS# 0812180330)